

MEMO# 1938

May 24, 1990

INSTITUTE COMMENT LETTER ON PROPOSED VIRGINIA REFUND RULE

May 24, 1990 TO: UNIT INVESTMENT TRUST MEMBERS NO. 29-90 RE: INSTITUTE COMMENT
LETTER ON PROPOSED VIRGINIA REFUND RULE

_____ The Virginia Corporations
Commission recently proposed an administrative rule that provides for the refund of a
portion of the registration fees paid by a unit investment trust. The proposed rule would
require a Request for Refund to be submitted within sixty days of the Virginia effective date
of registration and that a shareholders list be submitted. (See Memorandum to Unit
Investment Trust Members No. 27-90, dated May 15, 1990). In its comments on the
proposal, the Institute expressed opposition to the proposed requirement that the Request
for Refund be submitted within sixty days of the Virginia effective date of registration and
recommended that the appropriate time period be "within sixty days of the close of the
offering." In the alternative, the Institute recommended that the time period to submit the
request be extended to "within twelve months from the Virginia effective date." The
Institute also expressed strong opposition to the requirement that a shareholders list be
submitted, stating that it was unnecessary, jeopardizes client confidentiality and imposes a
requirement that cannot be met by sponsors of unit trusts. A copy of the Institute's letter is
attached. We will keep you informed of developments. Patricia Louie Assistant General
Counsel Attachment

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